

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: CHRYSLER, LLC, et al,

Case No. 10 CV 2493
RESPONSE TO MOTION FOR
MISCELLANEOUS RELIEF, AND MOTION TO
FILE OVERSIZED REPLY BRIEF

Debtor,

Chrylser LLC has invoked Local Rule 7.1(b) which states as follows:

Local Civil Rule 7.1(b) Length of Briefs on Appeals from Bankruptcy Court

Unless otherwise ordered by the district judge to whom the appeal is assigned, appellate briefs on bankruptcy appeals shall not exceed 25 pages and reply briefs shall not exceed 10 pages.

As can be seen in the pleadings, the Rejected Dealers are in the unenviable position of proving the negative – that is, that there is no place in the record evidence that a party other than old Chrysler made a demand that the 789 dealers be rejected as a condition precedent to closing. To do so, it was necessary to make the arguments in the length asserted, and to include those operative portions of the record for the courts review. We note that the local rule does not have a prohibition on the number of pages of exhibits, and that the exhibits were included for the court's convenience, as they are all part of the same record on appeal.

To that end, the Rejected Dealers now move the court for an order allowing an oversized Reply, and waive objection to a Sur Response on the part of Old Chrysler, should they so choose to respond.

Respectfully submitted this 14th day of June, 2010.

//STEPHEN PIDGEON //
STEPHEN PIDGEON, Esq.
LEO C. DONOFRIO, Esq.
3002 Colby Avenue, Suite 306
Everett, Washington 98201
(425)605-4774
Attorneys for Appellants